

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO DAVID POPKIN INTERROGATORIES  
(DBP/USPS-50 THROUGH 54)  
(July 2, 2012)**

The United States Postal Service provides institutional responses to the above-listed interrogatories of David Popkin dated June 22, 2012. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN**

**DBP/USPS-50** Please refer to your response to Interrogatory DBP/USPS-24 subparts [b] through [d].

[a] Is it possible to even provide an approximate number of facilities that fall into those categories?

[b] Please provide the number of carrier routes that fall into each of the three categories.

**RESPONSE:**

- a. The data required to provide the requested information are not available in a format that can be queried. Previously, the data were maintained for use in publishing the national ZIP Code directory, but since its discontinuance the data are not compiled. Due to the national scope of this question, it is not possible to approximate the numbers in each category.
- b. There are currently 143, 606 city carrier routes, 73,247 rural routes and 7,633 Contract Delivery Service (CDS) routes.

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**DBP/USPS-51** Please refer to your response to Interrogatory DBP/USPS-24 subparts [e] through [j].

- [a] Your response indicates that this condition, namely carriers return to their office too late to have the mail dispatched on the same day that it was collected from a customer, is primarily temporary in nature. On what do you base that belief?
- [b] Please advise the extent to which this condition is not temporary in nature but is a function of the normal return to the office by the carrier compared to the time of the final dispatch to the processing center.

**RESPONSE:**

- a. Carrier routes are adjusted so that carriers can return to the office in a timely manner to dispatch any mail collected. Routes are frequently adjusted, keeping the route at eight hours and maintaining this link to dispatch. Temporary situations such as sickness, natural disaster, varying mail volumes, truck delays and accidents and other situations arise that may prevent the carrier from returning on time to dispatch the mail. In the event of that a carrier returns after the dispatch, an employee at the office is expected to transport that mail either to the processing facility or to a downstream office to make the dispatch.
- b. There are exceptional situations, based primarily on travel patterns, where the local office implements a local cut-off time, and any mail whether collected across the window or from carriers received after that cut-off time is not dispatched but is retained until the first dispatch the following day. If such circumstances exist, this information should be posted in the lobby and made available to all customers. Such exceptional situations have existed for many years. The Postal Service does not have a

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**RESPONSE to DBP/USPS-51 (continued)**

centralized database that would permit a response to the request for a report of the extent to which this phenomenon occurs.

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**DBP/USPS-52** Please refer to your response to Interrogatory DBP/USPS-45.

- [a] Please confirm that your response will not be correct for the implementation of phase one on July 1<sup>st</sup>.
- [b] Please respond to the interrogatory for the conditions that will exist effective on July's implementation of phase one.

**RESPONSE**

- a. The response to the interrogatory referred to the full-up network, which will be implemented in February 2014. The Postal Service has performed no analysis to determine the number of service standard changes that will occur in the interim implementation period between July 2012 and February 2014.
- b. The Postal Service has performed no such analysis to determine pair-to-pair service standard changes that will occur at each step of the interim implementation in Phase 1.

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**DBP/USPS-53** Please refer to your response to Interrogatory DBP/USPS-48. Please explain why there must be a postal document purporting to reflect the statement of such a belief before the Postal Service can respond to my original interrogatory.

**RESPONSE:**

DBP/USPS-48 alleged that a particular belief was expressed by the Postal Service and requested that the Postal Service explain that belief. The Postal Service is of the view that it perverts the purposes of discovery for a party to be expected to explain or defend a particular statement or belief in the absence of any evidence that it expressed that statement or belief.

There are over half a million postal employees. It is within the realm of possibility that one of them in some context has expressed a view similar to that reflected in DBP/USPS-48. It matters for purposes of discovery and the issues in this docket whether such an expression was a personal viewpoint or an official statement issued by a properly authorized postal official. In the absence of any evidence of the latter, the Postal Service does not consider itself obliged to respond to DBP/USPS-48.

The question is akin to asking the Commission to explain why it believes the Washington Nationals will win the 2012 World Series -- in the absence of evidence that the Commission ever expressed such a belief. It is the Postal Service's view that the Commission would be very prudent if it were to respond, as a first step, by asking for some evidence that it ever officially offered such a prognostication.

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**DBP/USPS-54** Please refer to your response to Interrogatory DBP/USPS-49. Please confirm, or explain, that the present requirement for a weekday collection at a city delivery office of 5 PM or later will not change for any of the existing requirements for such a collection.

**RESPONSE:**

It is confirmed that the times and/or requirements for such collections will not change as a result of network rationalization. It is worth noting that the utilization of collection boxes is continuously under review. Changes in the utilization independent of network rationalization may lead to changes in the location of collection boxes.